

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MOTION FOR INITIAL
DISCLOSURE, REPLY TO
RESPONDENT ANSWER TO
AMENDED COMPLAINT

JOHNNY B. BROWN 96b2223

PLAINTIFF,

No. 18-CV-2628(KMK)

-v-

VENETTOZZI, et al,

DEFENDANTS.

MEMO ENDORSED

KENNETH M. KARAS, HON. DIS. JUDGE

JOHNNY B. BROWN PRO SE PLAINTIFF, currently incarcerated at ORLEANS CORR. FAC. is filing this motion for Initial Disclosure and as a reply to Respondent motion replying to allege THIRD AMENDED COMPLAINT which PLAINTIFF never filed.

1.) FIRST AND FOREMOST Plaintiff is requesting that Respondent motion be denied as a matter of law where here the Respondent ask that 8 defendants that are not a part of this proceeding be dismissed. One look at Respondent motion will established that Respondent have clearly mixed up defendants from two different cases. At this moment I am currently under Quarantine in G-1 dorm here at ORLEANS CORR. FAC. so I have no access to law library to produce copys of Respondent motion so I am asking your HON. to review motion that Respondent submitted as proof of such motion having no merit.

2.) PLAINTIFF is requesting documents(copys) of the following documents: the actual tape of SUPT. Hearing, all transcripts of said hearing, All documents concerning Article 78 proceeding, any/all legal pending or settled litigation against all defendants, any/all greivances or disclinary actions filed, reviewed, or pending against all defendants. PLAINTIFF is requesting copies of all documents that RESPONDENT have access to concerning this matter before

YOUR HONOR:SUPT. HEARING,ARTICLE 78,and the current Action under 42 U.S.C.
SEC.1983.

3.)In closing PLAINTIFF is requesting that YOUR HONOR will reconsider Plaintiff
motion for counsel as this proceeding move forward to more complex,and
Plaintiff have much less access to the law library and no access to legal
assistance.

WHEREFORE,PLAINTIFF request that Respondent motion be denied as it is clear
it has no merit,also request that Respondent be ORDERED to produce Documents
Plaintiff have requested.MAY GOD BLESS YOUR HONOR,RESPONDENTS,and all the Staff
of the Court!

RESPECTFULLY SUBMITTED,JOHNNY B.BROWN 96b2223



dated:4-7-21

cc:JOHNNY B.BROWN 96b2223

JENNIFER ROSE GASHI,ESQ.

HON.KENNETH M.KARAS


JOHNNY B.BROWN 96b2223
ORLEANS CORR.FAC.
3531 GAINES BASIN RD.
ALBION,NY,14411-9199

No.18-CV-2628

Plaintiff's request that the Court deny Defendants' motion is denied, because Defendants have no pending motions. Plaintiff's request for initial disclosure is denied without prejudice, because these requests should be directed to Defendants in the first instance. Plaintiff's request that the Court appoint counsel is denied without prejudice, because Plaintiff does not explain what efforts have been made thus far to get counsel. *See Justice v. Kuhnapfel*, 982 F. Supp. 2d 233, 235 (E.D.N.Y. 2013) ("A plaintiff requesting appointment of counsel must show that she is unable to obtain counsel before appointment will even be considered." (citation and quotation marks omitted)).

4/14/21

SO ORDERED


KENNETH M. KARAS U.S.D.J.

The Clerk of the Court is directed to
mail a copy of this Order to the Plaintiff

ORLEANS CORRECTIONAL FACILITY

3531 Gaines Basin Road
Albion, New York 14411-9199

NAME: JOHNNY B. BROWN

DIN: 96b2223

ORLEANS



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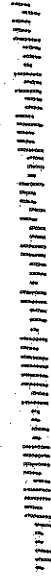
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NAME: J. B. Brown DIN: 96B2223